

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

-----X
Steven Jude Hoffenberg, individually, and as
constructive trustee of the Noteholders and
Bondholders of Towers Financial Corporation,

Plaintiffs,

-against-

Jeffrey E. Epstein, individually, and as President
and Chief Executive Officer of The Financial
Trust Company, The Financial Trust Company,
XYZ Corp., and ABC, Inc.,

Defendants.
-----X

Index No.: 1:16-cv-03989-RJS

RULE 7.1 STATEMENT

Pursuant to Federal Rule of Civil Procedure 7.1, the undersigned counsel for The Financial Trust Company certifies that there is no parent corporation or any publicly held corporation owning 10% or more of The Financial Trust Company's stock.

Dated: New York, New York
June 20, 2016

TROUTMAN SANDERS LLP

By: /s/ Bennet J. Moskowitz
Bennet J. Moskowitz
875 Third Avenue
New York, NY 10022
Phone: (212) 704-6000
Fax: (212) 704-6288
bennet.moskowitz@troutmansanders.com

*Counsel for Defendants Jeffrey E. Epstein,
individually and as President and Chief
Executive Officer of The Financial Trust
Company, and The Financial Trust
Company*